

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)

In re:	)	
	)	
KEVIN C. RYCHLIK,	)	Case No. 21-11441-KHK
	)	Chapter 7
Debtor.	)	

**NOTICE OF MOTION AND NOTICE OF HEARING**

Icon Finance, LLC has filed with the Court a motion to extend the time to file a complaint objecting to the discharge of the debtors and/or the dischargeability of its claims.

**UNDER LOCAL BANKRUPTCY RULE 9013-1, UNLESS A WRITTEN RESPONSE IN OPPOSITION TO THIS MOTION AND SUPPORTING MEMORANDUM ARE FILED WITH THE CLERK OF COURT AND SERVED ON THE MOVING PARTY WITHIN 21 DAYS OF THE SERVICE OF THIS NOTICE, THE COURT MAY DEEM ANY OPPOSITION WAIVED AND TREAT THE MOTION AS CONCEDED.**

**A HEARING TO CONSIDER THE RELIEF REQUESTED IN THIS MOTION IS SCHEDULED FOR DECEMBER 3, 2024 @ 11:00 A.M. IN COURTROOM III, UNITED STATES BANKRUPTCY COURT, 200 SOUTH WASHINGTON STREET, ALEXANDRIA, VIRGINIA 22314**

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not wish the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then on or before **21 days from the date of this Notice** you or your attorney must:

- File with the court, at the address shown below, a written response with supporting memorandum as required by Local Bankruptcy Rule 9013-1(H). **Unless a written response and supporting memorandum are filed and served by the date specified, the Court may deem any opposition waived, treat the motion as conceded, and issue an order granting the requested relief without further notice or hearing.** If you mail your response to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above. You must also mail a copy to the persons listed below.
- Attend the hearing scheduled to be held on **December 3, 2024 at 11:00 a.m.** in

Courtroom No. III, United States Bankruptcy Court, 200 South Washington Street, Alexandria, Virginia 22314. **If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.**

- A copy of any written response must be mailed to the following persons:

Steven H. Greenfeld, Esq.  
325 Ellington Blvd, #610  
Gaithersburg, MD 20878

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Dated: November 4, 2024.

Respectfully submitted,

LAW OFFICES OF STEVEN H. GREENFELD, L.L.C.

By: /s/ Steven H. Greenfeld

Steven H. Greenfeld  
325 Ellington Blvd, #610  
Gaithersburg, MD 20878  
(301) 881-8300  
Steveng@cohenbaldinger.com  
Counsel for Icon Finance LLC

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 4<sup>th</sup> day of November 2024, I reviewed the Court's CM/ECF system and it reports that an electronic copy of the foregoing Notice will be served electronically via the Court's CM/ECF system on the following:

Michael T. Freeman [michael.t.freeman@usdoj.gov](mailto:michael.t.freeman@usdoj.gov), [robert.w.ours@usdoj.gov](mailto:robert.w.ours@usdoj.gov)  
John Paul Goetz [docs@johnngoetzlaw.com](mailto:docs@johnngoetzlaw.com), [john@johnngoetzlaw.com](mailto:john@johnngoetzlaw.com)  
[goetzjr45880@notify.bestcase.com](mailto:goetzjr45880@notify.bestcase.com); [goetzjr75844@notify.bestcase.com](mailto:goetzjr75844@notify.bestcase.com)  
Jeffery T. Martin, Jr. [jeff@martinlawgroup.com](mailto:jeff@martinlawgroup.com), [martin.jefferyt.b119228@notify.bestcase.com](mailto:martin.jefferyt.b119228@notify.bestcase.com)  
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Timothy J. McGary [tjm@mcgary.com](mailto:tjm@mcgary.com), [mark@mcgary.com](mailto:mark@mcgary.com)  
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Gerard R. Vetter [ustpreion04.ax.ecf@usdoj.gov](mailto:ustpreion04.ax.ecf@usdoj.gov)

I further certify that on November 4, 2024, a copy of the foregoing Notice was served by first class United States mail, postage prepaid to the following:

Kevin C. Rychlik  
13744 Senea Drive  
Gainesville, VA 20155

/s/ Steven H. Greenfeld  
Steven H. Greenfeld